

## United States District Court

SOUTHERN

DISTRICT OF

TEXAS

McALLEN DIVISION

UNITED STATES OF AMERICA

V.

## CRIMINAL COMPLAINT

Lesbia Alejandra Rodriguez

Principal

YOB: 1977

United States

Nadia Lizbeth Jaramillo-Esquivel

Co-Principal

YOB: 1979

Mexico

Case Number:

M-20- 563 -M

(Name and Address of Defendant)

I, the undersigned complainant being duly sworn state the following is true and correct to the best of my knowledge and belief. On or about February 28, 2020 in Starr County, in the Southern District of Texas defendants(s) did,  
(Track Statutory Language of Offense)

knowing or in reckless disregard of the fact that Juan Alberto Bamaca, citizen of Guatemala, and Jose Manuel Oliva, citizen of Honduras, along with two (2) other undocumented aliens for a total of for (4), who had entered the United States in violation of law, did knowingly transport, or move or attempted to transport said aliens in furtherance of such violation of law within the United States, that is, from a location near Roma, Texas to the point of arrest near Roma, Texas,

in violation of Title 8 United States Code, Section(s) 1324(a)(1)(A)(ii) FELONY

I further state that I am a(n) Border Patrol Agent and that this complaint is based on the following facts:

On February 28, 2019 Border Patrol Agents received information about a residence in Roma, Texas being used as a stash location for illegal aliens. Agents conducted surveillance and observed a black in color Land Rover SUV backing out from inside the garage at the residence. The SUV then drove south and agents observed several subjects attempting to conceal themselves in the backseat. Agents requested assistance from Roma Police Department. A Roma Police Officer conducted a traffic stop on the vehicle for failure to stop at a designated point.

I declare under penalty of perjury that the statements in this complaint are true and correct. Executed on March 1, 2020.

SEE ATTACHED

Continued on the attached sheet and made a part of this complaint ☒ Yes ☐ No

Submitted by reliable electronic means, sworn to and attested to telephonically per Fed. R. Cr. P. 4.1, and probable cause found on:

/s/ Annjeri Skarboszewski  
Signature of Complainant

Annjeri Skarboszewski Border Patrol Agent  
Printed Name of Complainant

March 1, 2020 @ 2:59 pm  
Date

at McAllen, Texas  
City and State

Juan F. Alanis, U. S. Magistrate Judge  
Name and Title of Judicial Officer

Signature of Judicial Officer

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
McALLEN, TEXAS**

**ATTACHMENT TO CRIMINAL COMPLAINT:**

**M-20- 563 -M**

**RE:     Lesbia Alejandra Rodriguez  
        Nadia Lizbeth Jaramillo-Esquivel  
        0**

**CONTINUATION:**

Agents approached the driver and questioned her as to her citizenship. The driver, later identified as Lesbia Alejandra Rodriguez, responded that she was a United States Citizen. Agents questioned the front seat passenger, later identified as Nadia Lisbeth Jaramillo-Esquivel, as to her citizenship. She presented agents with an Employment Authorization card. Agents questioned Rodriguez about the passengers in the backseat of her vehicle, she responded that they were illegal aliens and she had just picked them up from a house. Agents read both the driver and passenger their Miranda rights, shortly thereafter Jaramillo-Esquivel stated that there were more illegal aliens in the residence.

As agents approached the residence to conduct and knock and talk, numerous subjects were seen attempting to jump out of windows and one subject broke through the wooden frame of the garage area attempting to abscond. A subject opened the front door and Roma Police Officers and agents observed several subjects running toward the back of the residence. Agents and officers entered the residence and detained all the subjects. All subjects encountered in the residence were determined to be illegally present in the United States.

**PRINCIPAL STATEMENTS**

Lesbia Alejandra Rodriguez, a citizen of the United States, was read her Miranda rights and agreed to provide a sworn statement without the presence of an attorney.

Lesbia Alejandra Rodriguez stated that she was originally going to go to Houston, Texas to visit her boyfriend. Rodriguez stated that her friend Nadia Jaramillo called her and she went to pick up Jaramillo at her residence in Pharr, Texas. She further stated that they then went to Roma, Texas and picked up the subjects at a residence. She acknowledged that she knew they were illegally present in the United States. Rodriguez stated the purpose of going to Roma was for Jaramillo to pick up some money. Rodriguez stated that once they arrived at the house a male subject opened the garage door, she drove inside and four subjects got into her SUV. Rodriguez stated she did not know where she was going to take the illegal aliens but she assumed it would be Laredo or Zapata. Rodriguez claims she was not going to receive any compensations for transporting the illegal aliens.

Nadia Jaramillo-Esquivel, a citizen of Mexico, was read her Miranda Rights and agreed to provide a sworn statement without the presence of an attorney.

Nadia Jaramillo-Esquivel stated that she was contacted by a friend to pick up several illegal aliens in Roma, Texas and take them to Laredo, Texas. She stated she has done this on several occasions and she takes them to a Family Dollar store in Laredo, Texas. Jaramillo-Esquivel stated that after taking the illegal aliens to Laredo, she and Rodriguez were going to Houston, Texas for the weekend. Jaramillo-Esquivel claimed Rodriguez knew that they would be picking up illegal aliens in Roma, Texas.

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
McALLEN, TEXAS**

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**RE:     Lesbia Alejandra Rodriguez  
        Nadia Lizbeth Jaramillo-Esquivel  
        0**

**CONTINUATION:**

**MATERIAL WITNESS STATEMENTS**

Juan Alberto Bamaca, a citizen of Guatemala, was read his Miranda rights and agreed to provide a sworn statement without the presence of an attorney.

Juan Alberto Bamaca stated that he was to pay \$4000 for his smuggling arrangements to Florida. Bamaca stated he made his illegal entry into the United States on February 27<sup>th</sup> near Roma, Texas. He was then dropped off at a stash house. He was informed that three of the subjects needed to prepare to leave the stash house. He entered a black truck with three other subjects and observed that the driver and front passenger were both females. He described the driver as having a blouse with squares.

Jose Manuel Oliva was read his Miranda Rights. He understood his rights and agreed to provide a sworn statement without the presence of an attorney.

Oliva, a citizen of Honduras, stated his friend made the smuggling arrangements and was going to pay \$11,200. After crossing the river along with three others, Oliva claimed they walked until a vehicle picked them up and transported them to the house where he was eventually apprehended. At the house, Oliva claimed he received a call and was told a vehicle was going to pick him up along with three other aliens. Oliva stated a four door ram truck entered the garage and noticed two females were already on board. Oliva claimed he sat behind the female driver and the other female subject was sitting on the front passenger seat. Oliva claimed the female sitting on the passenger seat was younger than the female driver.